

Presentment Date and Time: July 11, 2016 at 12:00 noon (Prevailing Eastern Time)  
Objection Deadline: July 11, 2016 at 11:30 a.m. (Prevailing Eastern Time)

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Jayant W. Tambe  
Laura W. Sawyer  
Ryan J. Andreoli

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	Case No. 08-13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X	:	

**NOTICE OF PRESENTMENT OF THIRD CLAIMS LITIGATION SCHEDULE FOR  
THE OBJECTION OF DEBTORS AND DEBTORS IN POSSESSION TO CLAIMS OF  
QVT FUND LP AND QUINTESSENCE FUND L.P.**

**PLEASE TAKE NOTICE** that the undersigned will present the annexed Third Claims Litigation Schedule for the Objection of Debtors and Debtors in Possession to Claims of QVT Fund LP and Quintessence Fund L.P. (the “Claims Litigation Schedule”) to the Honorable Shelley C. Chapman, United States Bankruptcy Judge, for signature on **July 11, 2016 at 12:00 noon (Prevailing Eastern Time)**.

**PLEASE TAKE FURTHER NOTICE** that unless a written objection to the proposed Scheduling Order, with proof of service, is served and filed with the Clerk of the Court and a courtesy copy is delivered to (i) the Bankruptcy Judge's chambers and (ii) the undersigned, so as to be received by **July 11, 2016 at 11:30 a.m. (Prevailing Eastern Time)**, the Scheduling Order may be signed.

Dated: July 1, 2016  
New York, New York

Respectfully submitted,

/s/ Laura Washington Sawyer

Jayant W. Tambe

Laura W. Sawyer

Ryan J. Andreoli

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	:	
Debtors.	:	(Jointly Administered)
-----X	:	

**THIRD STIPULATED CLAIMS LITIGATION SCHEDULE**

WHEREAS, on February 11, 2015, the Court so-ordered the Parties' stipulated Claims Litigation Schedule for the Objection of Debtors and Debtors in Possession to the Claims of QVT Fund LP and Quintessence Fund L.P. [Docket No. 48190];

WHEREAS, on October 19, 2015, the Court so-ordered the Parties' stipulated Revised Second Stipulated Claims Litigation Schedule [Docket No. 51209] (the "Claims Litigation Schedule");

WHEREAS, the Court held conferences on April 8, 2016 and April 29, 2016; and

WHEREAS, the Parties have met and conferred and agreed to extend various deadlines in the Claims Litigation Schedule,

NOW, THEREFORE, the Parties hereby stipulate and agree to modify the Claims Litigation Schedule as follows:

1. All fact discovery shall be completed by July 29, 2016.
2. The Parties' document productions shall be completed on or before June 22, 2016.
3. Final privilege logs shall be served on or before June 27, 2016.
4. Depositions of fact witnesses must be completed no later than July 29, 2016.

5. Interrogatories pursuant to Local Bankruptcy Rule 7033-1(c) and requests for admissions will be served on or before August 10, 2016.

6. QVT Fund LP and Quintessence Fund L.P. (collectively, "QVT") shall disclose the identities of any of its testifying expert witnesses and serve any expert reports pursuant to Federal Rule of Civil Procedure 26(a)(2)(B) on August 15, 2016.

7. Depositions of experts disclosed pursuant to paragraph 6 must be completed no later than September 12, 2016.

8. Debtors shall disclose the identities of any of their testifying expert witnesses and serve any expert reports pursuant to Federal Rule of Civil Procedure 26(a)(2)(B) on October 3, 2016.

9. Depositions of experts disclosed pursuant to paragraph 8 must be completed no later than October 31, 2016.

10. The parties shall serve any rebuttal expert reports on November 21, 2016.

11. Depositions of experts disclosed pursuant to paragraph 10 must be completed no later than December 23, 2016.

12. As required by applicable rules, if a party wishes to file a dispositive motion, that party shall request a pre-motion conference with respect to such motion on or before January 4, 2017.

13. The Claims Hearing regarding the Claims of QVT shall commence on January 18, 2017.

Dated: July 1, 2016  
New York, New York

/s/Laura Washington Sawyer  
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*Attorneys for Debtors and  
Debtors in Possession*

Dated: July 1, 2016  
New York, New York

/s/ Benjamin J.O. Lewis  
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*Attorneys for QVT Fund LP and  
Quintessence Fund L.P.*

Dated: July \_\_\_, 2016  
New York, New York

SO ORDERED

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UNITED STATES BANKRUPTCY JUDGE